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July 22, 2019

BY ECF ONLY

U.S. District Court for the District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07101

Attn: Honorable Susan D. Wigenton, U.S.D.J.

Re: Schiff Food Products Co., Inc. v. Turer Bitkisel Uretim Hayvancilik et al.
Case Number : 2:18-CV-09017-SDW-CLW
Our file No. : 2282-1153

Dear Judge Wigenton:

This firm represents the Plaintiff, Schiff Food Products Co., Inc. ("Schiff"), in this action.

On July 16, 2019, Your Honor granted Schiff's letter request for an extension of time to file a combined reply brief in support of Schiff's pending Motion for Default Judgment against the Defendants and in opposition to the cross-motion of Defendant Celsan Ithalat Ihracat ve Ticaret Limited Sirketi ("Celsan") To Vacate the Default previously entered against it and any similar cross-motion by Defendant Turer Bitkisel Uretim Hayvancilik, Insaat, Su Urunleri, Orman Urunleri Tarim Gida Sanayi ve Ticaret Anonim Sirketi d/b/a Turer Bitkisel, A.S. Tepecik Mah ("Turer"), pursuant to Local Civil Rule 7.1(h). (A copy of Your Honor's so-ordered endorsement to Schiff's letter request is enclosed.)

On the same date that Schiff's extension request was granted, Schiff received ECF notification that Celsan had also filed a Motion to Compel Arbitration and to Stay or Alternatively Dismiss this action. The return date was subsequently set in the ECF docket as August 5, 2019. This would have required any opposition by Schiff to have been filed, under the Local Rules, by today, only six days after receiving notification of the Motion to Compel Arbitration.

As the issues presented by Celsan's Motion to Compel Arbitration are inextricably intertwined with the other pending motions of the parties, and given the abbreviated period of time accorded Schiff to prepare separate opposition to the Motion to Compel, Schiff respectfully requests that it be granted an extension of time, to and including August 19, 2019, to submit, either separately or as part of its combined

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reply to be filed on that date, any opposition to Celsan's Motion to Compel Arbitration, and to any similar motion that Defendant Turer may file.

Respectfully Yours,

LITCHFIELD CAVO LLP



JOSEPH E. BOURY

JEB:nd

cc:

VIA ECF AND U.S. MAIL

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July 11, 2019

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U.S. District Court for the District of New Jersey
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Attn: Honorable Susan D. Wigenton, U.S.D.J.

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Dear Judge Wigenton:

This firm represents the Plaintiff, Schiff Food Products Co., Inc. ("Schiff"), in this action.

At Schiff's request, the Clerk entered a default against the Defendants on March 29, 2019 for having failed to properly answer or otherwise defend. Thereafter, Schiff moved for a Default Judgment against the Defendants. Schiff's motion was made returnable on July 1, 2019.

On June 28, 2019, on the eve of the return date for Schiff's motion, Louis Maione, Esq., wrote to Your Honor, advising that he and Petek Gunay, Esq., had been retained by Defendant Turer Bitkisel Uretim Hayvancilik, Insaat, Su Urunleri, Orman Urunleri Tarim Gida Sanayi ve Ticaret Anonim Sirketi d/b/a Turer Bitkisel, A.S. Tepecik Mah ("Turer") and requested a three-week extension of time, through July 22, 2019, to submit opposition to Schiff's Motion for Default Judgment. This request was granted by the Court. However, it is unclear whether the July 22 date was also intended to be the new return date or motion day for the submission of Schiff's motion.

On July 1, 2019, the other defendant in this action, Celsan Ithalat Ihracat ve Ticaret Limited Sirketi ("Celsan"), appeared through counsel, Erol Gulistan, Esq., who filed a Cross-Motion to Vacate the Default entered against Celsan on March 29, 2019. This cross-motion was not entered in the ECF docket until July 3, 2019, at which time Schiff received its first notification of the cross-motion. Celsan's Cross-Motion did not indicate if it was intended to be returnable on July 22 or reflect any other return date. However, Celsan submitted a combined brief in support of its cross-motion and in

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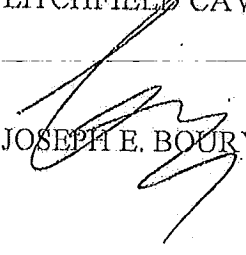
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opposition to Schiff's Motion for Default Judgment. It is unclear if Turer intends to join in Celsan's motion or file its own, similar, cross-motion.

Schiff wishes to file a combined reply brief in support of its original Motion for Default Judgment and in opposition to Celsan's cross-motion and any similar cross-motion by Turer, pursuant to Local Civil Rule 7.1(h). Schiff assumes that any combined brief in response to Celsan's cross-motion would ordinarily be due seven days prior to any new return date for Schiff's original motion. However, given that Schiff presumably will not be served with Turer's opposition until on or close to July 22, and in the interests of judicial economy and efficiency, Schiff respectfully requests that it be granted an extension of time, to and including August 19, 2019 (which it believes is a scheduled motion day), to submit a combined reply brief in further support of its Motion for Default Judgment and in opposition to the Celsan cross-motion and any similar cross-motion that may be made by Turer.

Respectfully Yours,

LITCHFIELD CAVO LLP


JOSEPH E. BOURY

JEB:nd

cc:

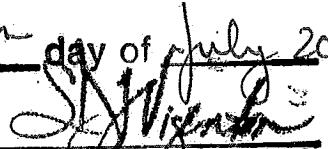
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So Ordered

this 16th day of July 2019

Susan D. Wigenton, U.S.D.J.